

**BARBARA LOCKWOOD**

Senior Vice President, Public Policy

Mail Station 9040  
PO Box 53999  
Phoenix, Arizona 85072-3999  
Tel 602-250-3361  
Barbara.Lockwood@aps.com

April 24, 2020

Docket Control  
Commissioner Sandra D. Kennedy  
ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, AZ 85007

Re: Response of Arizona Public Service Company (APS or Company)  
Inquiry into Utility Preparedness During the COVID-19 Crisis  
Docket No. AU-00000A-20-0050

Dear Commissioner Kennedy:

APS has received your April 17, 2020 letter requesting disclosure of employee and contractor information on COVID-19 issues, including testing and notification protocol.

There are stringent federal and state laws that limit the amount and type of information the Company can provide publicly regarding the health of its employees and contractors.<sup>1</sup> Additionally, because widespread testing has not yet been made available in Arizona, employees may not know their COVID-19 status and those who know may not report it. Thus, APS does not have complete information regarding the status of its employee base with regard to COVID-19.

With this in mind, the Company responds to your request as follows:

- Based on information available to APS as of April 24, 2020, eight (8) employees have tested positive for COVID-19. None of these employees have work responsibilities which bring them in contact with the general public.
- As of April 24, 2020, four (4) APS contractors have also tested positive for COVID-19, again based on information available to APS.
- For the reasons noted above, APS cannot know how many individuals may have exhibited symptoms of COVID-19. Additionally, as the Commission is aware, not all COVID-19 carriers are symptomatic. Symptoms of COVID-19 also vary greatly from person to person, and many of the symptoms typical of COVID-19 are also symptoms of other ailments such as a cold or the flu.

<sup>1</sup> E.g., the Health Insurance Portability and Accountability Act (HIPAA); A.R.S. 36-664(A).

- APS directs all employees to stay home and call the Company's Health Services COVID-19 Hotline when they are experiencing a cough, sore throat, headache, fever, respiratory issues or other reported potential symptoms of COVID-19. All health related calls to the Hotline are followed up by a representative of the APS Health Services department, who conducts a detailed health assessment questionnaire with the employee.
- If the assessment shows the symptoms may be related to COVID-19, the employee is strongly encouraged to follow up with their personal medical provider. The Company does not automatically test all individuals who report symptoms of COVID-19. Those who report symptoms are encouraged to seek medical care and direction from their personal medical provider. The employee's personal medical provider will then determine whether to send an individual to a testing facility.

If the employee then tests positive for COVID-19, the employee is required to self-quarantine for at least ten (10) days or until the employee's symptoms have resolved for at least three (3) days in accordance with CDC guidelines. The employee's leader is notified that the employee has self-quarantined and will not be available for work.

Health Services also follows up with the employee throughout the quarantine to provide support as needed and will clear the employee to return to work when appropriate. Once the employee returns to work, he/she is required to social distance and wear a mask for an additional seven (7) days.

- In addition, when an employee tests positive for COVID-19, APS Health Services conducts an interview with the employee to determine where he/she have worked for the 48 hours prior to testing or becoming symptomatic, and with whom the employee had close contact at work. This information allows APS to determine a plan of action to notify appropriate individuals, advise and educate them on how to protect themselves and their family members, and what to do if they in turn exhibit symptoms.

APS has no ability to monitor employee or contractor activity during off-work time. However, APS does communicate to all employees and contractors the importance of following CDC guidelines during a pandemic including social distancing, frequent handwashing, and the use of personal protective equipment.

- As has been widely reported in the media, testing availability has thus far been fairly limited in our communities. While an individual's personal medical provider can recommend testing, the testing facility itself will ultimately determine whether to administer a test.

APS recognizes that electric service is vital to maintain essential levels of service to the community, and the Company is committed to providing continuity of service to our customers. For this reason, APS has partnered with Arizona State University to obtain a limited number of screening tests that have been made available to certain essential employees through ASU's state-of-the-art, clinically certified Biodesign Institute laboratory.

These screening tests have been administered to 623 Company employees as of April 17, 2020. The Company does not know how many employees and other

associated individuals may have been tested by the private medical community or a personal medical provider for the reasons noted earlier.

- APS is not aware of any obligation to notify the general public when an employee or contractor exhibits symptoms of or tests positive for COVID-19, and to do so may violate privacy laws. As discussed above, APS Health Services conducts contact tracing with employees that have tested positive for COVID-19 in order to provide appropriate notification to individuals that may have come in close contact with that employee.

Positive COVID-19 tests are reported to the appropriate authorities, such as the Arizona Department of Health Services, by the testing facilities. In the event that an APS employee tests positive through Company testing, APS confirms with the testing facility that the proper authorities have been notified.

The health and safety of our employees is of paramount importance to APS. The Company will continue to monitor the COVID-19 pandemic, and will update employee guidelines and requirements consistent with advice from health experts to keep our employees informed and able to provide the essential electric service our customers need and expect.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Barbara D. Lockwood". The signature is written in a cursive, flowing style.

Barbara Lockwood

BDL/bgs